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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN JOSE DIVISION**

MAXIMILIAN KLEIN, et al., on behalf of  
themselves and all others similarly situated,

Plaintiffs,

v.

META PLATFORMS, INC., a Delaware  
Corporation,

Defendant.

Case No. 5:20-cv-08570-JD

**[PROPOSED] ORDER REGARDING  
DEFENDANT'S RESPONSE TO  
PLAINTIFFS' ADMINISTRATIVE  
MOTION TO CONSIDER WHETHER  
ANOTHER PARTY'S MATERIAL  
SHOULD BE SEALED**

Judge: Hon. James Donato

THIS MATTER, having come before the Court on Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should be Sealed, and the Court having considered the Declaration of Jitin Khurana In Support of Defendant's Response to Plaintiffs' Administrative Motion to Consider Whether Another Party's Material Should be Sealed, and other appropriate papers:

The Court finds compelling reasons to support the filing under seal of the portions of documents described herein. Accordingly,

IT IS ORDERED that the following portions of documents shall be filed under seal and sealed from the public record:

Information in FAC and Redline Sought to Be Sealed <sup>1</sup>	Reason for Sealing
Redacted information at Table of Contents, page ii <sup>2</sup>	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 9	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 10	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 179	Contains non-public information regarding contracts with business counterparties to whom Meta owes a duty of confidentiality.
Redacted information at ¶ 180	Contains non-public information regarding contracts with business counterparties to whom Meta owes a duty of confidentiality.
Redacted information at ¶ 305	Contains non-public information regarding contracts with business counterparties to whom Meta owes a duty of confidentiality.
Redacted information at ¶ 307	Contains non-public information regarding a contract with a business counterparty to whom Meta owes a duty of confidentiality.

<sup>1</sup> The citations in the Redline are identical to those in the FAC.

<sup>2</sup> Meta has not provided line numbers for its proposed redactions because the FAC is formatted such that the text does not always align with the line numbers.

Redacted information at ¶ 309	Contains non-public information regarding contracts with business counterparties to whom Meta owes a duty of confidentiality.
Redacted information at ¶ 310	Contains non-public information regarding contracts with business counterparties to whom Meta owes a duty of confidentiality.
Redacted information at ¶ 313	Contains non-public information regarding contracts with business counterparties to whom Meta owes a duty of confidentiality.
Redacted information at page 100, heading C.1	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 436	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 437	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 438	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 440	Contains non-public information regarding advertising sales to individual advertisers which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 9).
Redacted information at ¶ 441	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 442	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 443	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause

	competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 444	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 445	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 446	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 447	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 448	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 449	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 450	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 451	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 452	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).

Redacted information at ¶ 454	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 455	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 456	Contains non-public information regarding advertising sales to individual advertisers which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 9).
Redacted information at ¶ 458	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 459	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 460	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 461	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).
Redacted information at ¶ 463	Contains non-public information regarding negotiation strategy and which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 6).  Contains non-public information regarding advertising sales to individual advertisers which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 9).
Redacted information at ¶ 464	Contains non-public information regarding specific terms of a contract with a business

	counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 465	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 466	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 467	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 468	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 469	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 470	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 471	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 472	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 7).
Redacted information at ¶ 485	Contains non-public information regarding advertising sales to individual advertisers which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 9).

Redacted information at ¶ 486	Contains non-public information regarding advertising sales to individual advertisers which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 9).
Redacted information at ¶ 500	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 501	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 502	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 503	Contains non-public information regarding advertising sales to individual advertisers which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 9).
Redacted information at ¶ 509	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 510	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 511	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 512	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 513	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors



	or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 514	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 515	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 516	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 517	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 518	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 519	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 520	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 521	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 522	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).



Redacted information at ¶ 523	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 524	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 530	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 531	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 534	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).
Redacted information at ¶ 535	Contains non-public information regarding specific terms of a contract with a business counterparty which, if revealed to competitors or counterparties, could cause competitive harm to Meta. ( <i>See</i> Khurana Decl. ¶ 8).

**IT IS SO ORDERED.**

Dated: March \_\_\_\_\_, 2022

\_\_\_\_\_  
The Honorable James Donato  
United States District Court Judge